

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

No. 17-cr-02949-MV

DASHAWN ROBERTSON,

Defendant.

**DEFENDANT DASHAWN ROBERTSON'S NOTICE OF EXPERT
TESTIMONY OF TOM JAMESON, ESQ.**

Defendant Mr. Dashawn Robertson, by counsel, the Law Office of Ryan J. Villa, by Ryan J. Villa, and Sarah Gorman, provides notice that he intends to introduce the expert testimony of Tom Jameson, Esq., at trial in this case. Mr. Robertson provides this notice pursuant to Fed. R. Crim. P. 16(b)(1)(C) and submits that this evidence is relevant to the issues to be tried and will assist the jury in understanding the evidence and determining facts in issue.

Mr. Robertson may call as an expert witness Mr. Jameson, a retired federal public defender with expertise in federal criminal practice, procedure, and sentencing as it relates to the use of jailhouse informants. Mr. Jameson's most current curriculum vitae is attached as **Exhibit 1**. Mr. Jameson can educate the jury about how sentencing is conducted in federal court, what the sentencing guidelines are, and how they operate in relation to a 5K1.1 motion by the government. He can testify about the use of jailhouse informants who are pending federal charges and how the informants' cooperation may affect their sentence. Mr. Jameson is expected to testify within the scope of his expertise regarding the estimated sentences under the applicable statutes and sentencing guidelines for Confidential Witnesses (CWs) 1 and 2, pre and post plea. He will also testify to the affect a motion for departure for substantial assistance can have on the applicability of a mandatory minimum sentence or sentencing guidelines. He may also rebut any

testimony from any law enforcement officer of CWs 1 or 2 that concerns the legal aspects of the cooperation agreements with the United States and CWs 1 or 2.

Mr. Jameson's testimony will be based upon his education, training, experience, and specialized knowledge. Mr. Jameson's opinions are based on his review of discovery produced by the government related to the prosecution of Mr. Robertson.

Respectfully submitted,

/s/ Ryan J. Villa

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CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2021, I filed the foregoing electronically through the CM/ECF system, which caused counsel for the United States to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Ryan J. Villa

RYAN J. VILLA